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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
 LITIGATION

Master Docket No. 07-m-1827 SI

This Document Relates To:

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING PARTIES'
 TIME TO MOVE TO COMPEL AS
 TO CERTAIN DISCOVERY**

*Motorola Mobility, Inc. v. AU Optronics
 Corporation, et al., C 09-5840 SI*

*AT&T Mobility LLC, et al. v. AU Optronics
 Corp., et al., C 09-4997 SI*

*Target Corp., et al. v. AU Optronics Corp., et
 al., Case No. CV-04945 SI*

Defendants AU Optronics Corporation and AU Optronics Corporation America (“AUO”) and Plaintiffs Motorola Mobility, Inc. (“Motorola”); AT&T Mobility, LLC, AT&T Corp., AT&T Services, Inc., Pacific Bell Telephone Company, AT&T Operations, Inc., AT&T DataComm, Inc., Southwestern Bell Co., (“AT&T”)¹; Target Corp.; Sears Roebuck and Co.; Kmart Corp.; Old Comp Inc.; Good Guys, Inc.; RadioShack Corp.; Newegg Inc. (collectively, the “Crowell Plaintiffs”) stipulate as follows:

WHEREAS Crowell Plaintiffs served a Joint Set of Interrogatories and Requests for Production of Documents on AUO on November 2, 2011 (the “November 2 Discovery”) and AUO provided Responses and Objections to the November 2 Discovery on December 5, 2011;

WHEREAS AUO served a set of Interrogatories and Requests for Admission on Motorola on July 8, 2011 (the “July 8 Discovery”) and Motorola provided Responses and Objections to the July 8 Discovery on August 26, 2011 and Supplemental Responses and Objections on November 29, 2011;

WHEREAS the parties have begun to meet and confer regarding certain of AUO’s Responses and Objections to the November 2 Discovery, and require additional time to complete the meet and confer process;

WHEREAS the parties have begun to meet and confer regarding Motorola’s Supplemental Responses and Objections to the July 9 Discovery, and require additional time to complete the meet and confer process;

WHEREAS AUO may wish to supplement certain of its Responses and Objections to the November 2 Discovery upon completing the meet and confer process;

WHEREAS AUO may produce additional documents responsive to the November 2 Discovery, and does not anticipate its ability to produce any such documents prior to the deadline for filing motions to compel;

WHEREAS Motorola may wish to supplement its Supplemental Responses and

¹ This stipulation is without prejudice to the Administrative Motion To Modify AT&T’s Trial Schedule filed on December 8, 2011, or to Defendants’ opposition thereto.

1 Objections to the July 8 Discovery upon completing the meet and confer process;

2 WHEREAS the current deadline to file motions to compel in the above-captioned cases is
3 December 15, 2011, and the parties have agreed to extend the deadline to move to compel further
4 responses to the November 2 Discovery and the July 8 Discovery until January 20, 2012;

5 THEREFORE, AUO and Crowell Plaintiffs by their respective undersigned counsel,
6 stipulate and agree as follows:

7 The deadline for Crowell Plaintiffs to move to compel further response to the November 2
8 Discovery, and for AUO to move to compel further response to the July 8 Discovery shall be
9 extended to January 20, 2012.

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Dated: December 15, 2011

/s/ Joshua C. Stokes

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By /s/ Christopher A. Nedeau

Attorneys for Defendants
AU Optronics Corporation and
AU Optronics Corporation America

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from the other signatories.

IT IS SO ORDERED.

Dated: 12/16, 2011



Hon. Susan Illston, United States District Judge